

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Civil Action No. 1:19-cv-00593-LCB-JLW

ZION WILLIAMSON,

Plaintiff,

V.

PRIME SPORTS MARKETING, LLC  
and GINA FORD

Defendants.

# DECLARATION OF ALVIN L. PITTMAN

ALVIN L. PITTMAN, being duly sworn, declares the following:

1. I am one of the attorneys for Defendants Prime Sports Marketing, LLC and Gina Ford. I make this declaration based on my personal knowledge and in support of the accompanying Motion for Extension of Time to file Response to Plaintiff's Motion for Attorneys' Fees. I will have primary responsibility for filing the response to this Motion.

2. When the Motion arrived, I was in the midst of responding to a dispositive motion in the Central District of California. I completed that task only on Monday, September 26.

3. I consulted with the other Defendants' attorneys on this case as soon as possible. More than one of those attorneys was then involved in a multi-week trial, another on the team was involved in completing multiple depositions in many different states. I am

still recovering from Covid related health issues that impact my stamina, although I am back at work. Other counsel and staff members are taking vacation time. Now, as I write this Motion, the Florida attorneys involved in this case are dealing with an approaching hurricane and possible power outages.

3. The complexity of issues about entitlement to and amount of attorneys' fees requires significant research and examination of the time records filed with the motion.

4. On September 23, 2022, I emailed Plaintiff's attorneys informing them of the need for this brief extension of time of 14 days beyond the current due date to respond to the motion. Plaintiff, through Attorney John Wester, responded via email on Sunday September 25 at 9:00 pm, stating that Plaintiff does not oppose the requested extension of time for Defendants to file their response to the Motion for Attorneys' Fees.

7. It is my belief that Plaintiff will not be prejudiced by this brief extension of time, moving the due date for response from October 5 to October 19, 2022. Defendants have not previously sought an extension to respond to this motion.

8. On behalf of Defendants, I do not make this motion either in bad faith or for purposes of undue delay.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 27, 2022

/s/ Alvin L. Pittman  
Alvin L. Pittman

CERTIFICATE OF ELECTRONIC SERVICE

I certify that on September 27, 2022, I electronically filed DECLARATION OF ALVIN L. PITTMAN with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to attorneys for Plaintiff, all of whom are registered with the Court.

This the 27th day of September 2022.

/s/ Alvin L. Pittman

Alvin L. Pittman, State Bar No. 8460

Attorney for Defendants

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